

August 15, 1997

To: Leo Winternitz

From: Rick Woodard



Subject: Response to Comments on Draft CMARP Framework Document

Thank you for your helpful comments on the subject draft document. I have addressed some of your comments with a generalized response, and have excerpted some for specific response. Your comments are attached in their entirety for the use of others who may receive copies of this document.

### **Program Management**

The purpose of distributing this draft framework document to the Water Quality Technical Group was to solicit technical comments concerning the specific elements of an acceptable monitoring, assessment, and applied research program. As was discussed at the August 6, 1997 meeting of the Water Quality Technical Group, we have been charged with developing the "job description" for the program, irrespective of how the program will be managed, or by what entities.

Specific discussion of a management structure for the program will involve the CALFED agency staffs and their managements. The purpose of mentioning a management structure at all in this document was to call attention to the need for an overall coordinating role if the envisioned program is to be competently managed. We are viewing this requirement as one aspect of the job description. Use in this document of language such as "CALFED will" must be understood as a shorthand for whatever implementing structure arises from the CALFED process.

It is important to this discussion to distinguish between program coordination as compared to program direction by a single individual. It seems unlikely that appointment of any single individual to set program direction would be an acceptable management approach. On the contrary we anticipate that, while CALFED agencies and other entities will have responsibilities for implementing the activity, it is really the stakeholders and citizens of California who must be satisfied with the result. Therefore, not only should there not be a single individual setting program direction unilaterally, neither should the management structure be perceived to be a small "cabal" of agency staff members. If this activity is to be successful, there needs to be broad based ownership on the part of the stakeholders.

The needed ownership in the program will occur through the involvement of groups such as regional water quality assessment cooperatives, watershed management groups, regulatory agencies, the regulated community, and others such as citizen volunteers. If the management structure that is ultimately adopted is consistent with this vision, it follows that coordination of the efforts of the disparate participants will present special challenges that will need to be met through a strong coordination function.

## Responses to Specific Comments

*· Second page, first bullet - It is stated that "Only the assessments required in direct support of the CALFED program will be included within CMARP." I am not quite sure what this statement means or implies. CMARP will be directing other agencies to implement the program. These agencies may have additional mandates or missions that need to be taken into consideration. Thus the need not only for a comprehensive program, but also one that is coordinated and even integrated. If CALFED completely covers the additional budgetary considerations of these agencies to do specified CALFED work, then I suppose they can focus solely on only CALFED program needs. A specific example of another mandate/mission is D-1485 monitoring. DWR and the USBR under the auspices of the IEP currently conduct this work. Unless water right permits are modified, this work will have to continue in addition to meeting other CALFED needs.*

Many agencies and other entities are involved in the CALFED process in one way or another. Whether these be CALFED agencies or other groups, each has its unique mission and objectives. While the CALFED process should undertake to help coordinate and integrate these activities consistent with CALFED objectives, it must also be true that CALFED does not necessarily share all of the missions and objectives of its participants. To avoid dilution of limited CALFED resources, funding through the CALFED program should be limited to those activities that directly support the CALFED mission and objectives. There is the intention that necessary budgetary resources for work to be undertaken in pursuit of CALFED objectives over the next two or three decades be provided through State and Federal funding sources. It appears likely that activities such as those you mentioned would be melded into the CALFED implementation program in some way.

*· First page, (under Principles) first paragraph -- Does this development of a robust management structure include the development of budgetary program to secure and distribute funds to conduct the work?*

An Implementation Plan for the CALFED program will be developed that will recommend the necessary budgetary program for this and the other implementation activities of CALFED.

*· First page, last bullet - It is stated that the emphasis on CMARP is not on data collection but on data evaluation and use. I would suggest that CMARP place equal emphasis on all three aspects. Poor data collection methods and techniques will result in mistaken data evaluation and erroneous use.*

There was not an intention to suggest that data collection is not critically important; rather, the intent was to emphasize that, whereas some historical monitoring programs have had the reputation of being strong on data collection and weak on data evaluation and interpretation, the

full value of this program will be attained through heavy emphasis on appropriate use of the data collected.

*· Second page, first paragraph under Annual Monitoring, Evaluation and Research Plan - It is stated here that each year the program manager will publish a plan for the monitoring, evaluation and research to be conducted the following year. Based on my experience, this is a lot of work. I would suggest that either three or five year plans be developed. These plans could be reviewed annually to ensure they still contain relevant program objectives.*

At the August 6 meeting of the Water Quality Technical Group, it was specified that the term "Annual" was not intended to be read literally, but to suggest the need for periodic evaluation, at intervals that are appropriate, and redesign of the program as needed to assure that it efficiently pursues its objectives

*· Last page, Implementation of the CMARP - It is stated here that CMARP will be implemented beginning with approval of 1997 Category III projects. How is the CMARP being implemented with relation to Category III? How does this implementation relate to CMARP as described in the draft document? Lastly, is it a little premature to start implementing CMARP based on a draft document that has not yet been thoroughly reviewed or commented on by various parties?*

As you are aware, Category III project funding will be underway very soon. We believe that, although it will take some time to fully develop the CMARP, Category III project development should include consideration of quality assurance/quality control design, standardized methodology, standardized electronic data structures, and other aspects of what will ultimately become the CMARP, and which are necessary to enable the information to be effectively used. An interim program will help assure the value of the investments made through the Category III process and will prove critically important to the longer term credibility of the CALFED program. It will certainly be a challenge to get adequate provisions in place for Category III while developmental work on the full program is ongoing. Still, it is our contention that we can ill afford not to have at least a rudimentary program in place to protect these early investments.

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